

<p>Notice to Asbestos Building Inspectors/Management Planners regarding Asbestos Survey Requirements</p>

This is an online version of a memorandum sent to all Licensed Asbestos Building Inspectors by mail. If you are a Licensed Asbestos Building Inspector and did not receive a copy of this memorandum, please print out this page. You may also request the mailed version of the memorandum by contacting the Asbestos Section at 803-898-4289.

MEMORANDUM

TO: SCDHEC Licensed Asbestos Building Inspectors

FROM: Lynn Barnes, Manager, Asbestos Section

DATE: April 27, 2004

RE: Asbestos Building Inspection Reports

The purpose of this correspondence is to advise all Asbestos Building Inspectors/Management Planners currently licensed in South Carolina that any asbestos building inspection report submitted to the Asbestos Section that does not comply with all of the requirements of SCDHEC Regulation 61-86.1, Section IV.B.3.a-e, and EPA Regulation 40 CFR 763.85(a)(4) will not be acceptable for licensing of any type of asbestos renovation or demolition project. Demolition notifications submitted with or based upon incomplete building inspection reports will be returned. Once a demolition notification has been returned due to an incomplete building inspection report, the ten-working day notification period will begin anew when the notification and an acceptable building inspection report have been resubmitted. Any person who continues to prepare incomplete building inspection reports may be referred to the Enforcement Section and may have his/her asbestos building inspection license suspended or revoked. For your convenience and reference, the State and Federal Regulations that are applicable to the duties of an Asbestos Building Inspector are included in this document:

SCDHEC Regulation 61-86.1, Section IV. B.3.a-e (June 28, 2002) requirements:

- “3. The building inspector or management planner shall:
- a. Comply with the procedures specified in 40 CFR 763.86 as amended, and any subsequent amendments and editions, in determining sampling locations and the number of representative samples to be collected. Samples shall be collected from friable and non-friable suspect ACM on affected interior and/or exterior facility components.

- b. Prepare a detailed report based on findings of the inspection to include the information required in 40 CFR 763.85 (a)(4)(iv)(A)-(E) as amended, and any subsequent amendments and editions. Also include a description of non-suspect materials excluding: glass, metals, kiln brick, cement, fiberglass, concrete, pressed wood, cinder block, and rubber.
- c. Provide an assessment of all materials suspected to contain asbestos, including an evaluation of the materials' current condition, estimated quantities, and potential for disturbance.
- d. Include the name, license number, date of inspection, and signature of the licensed building inspector or management planner who performed the inspection and completed the report.
- e. Ensure that bulk samples are analyzed in accordance with requirements specified in 40 CFR 763.87 as amended and any subsequent amendments and editions, and this regulation. Any laboratory that retains proficiency as demonstrated by successful participation in a nationally recognized testing program may be acceptable."

SCDHEC Regulation 61-86.1, Section IV.B.2.

"2. To be acceptable a building inspection shall have been performed no greater than three years prior to renovation or demolition, or if more than three years the previous inspection shall be confirmed and verified by a person licensed as a building inspector."

EPA Regulation 40 CFR 763.85(a)(3-4) Inspection:

"(3) Each inspection shall be made by an accredited inspector.

- (4) For each area of a school building, except as excluded under § 763.99, each person performing an inspection shall:
 - (i) Visually inspect the area to identify the locations of all suspected ACBM.
 - (ii) Touch all suspected ACBM to determine whether they are friable.
 - (iii) Identify all homogenous areas of friable suspected ACBM and all homogenous areas of nonfriable suspected ACBM.
 - (iv) Assume that some or all of the homogenous areas are ACM, and, for each homogenous area that is not assumed to be ACM, collect and submit for analysis bulk samples under §§ 763.86 and 763.87.
 - (v) Assess, under § 763.88, friable material in areas where samples are collected, friable material in areas that are assumed to be ACBM, and friable ACBM identified during a previous inspection.
 - (vi) Record the following and submit to the person designated under § 763.84 a copy of such record for inclusion in the management plan within 30 days of the inspection:

- (A) An inspection report with the date of the inspection signed by each accredited person making the inspection, State of accreditation, and if applicable, his or her accreditation number.
- (B) An inventory of the locations of the homogeneous areas where samples are collected, exact location where each bulk sample is collected, dates that samples are collected, homogeneous areas where friable suspected ACM is assumed to be ACM, and homogeneous areas where nonfriable suspected ACM is assumed to be ACM.
- (C) A description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, State of accreditation, and if applicable, his or her accreditation number.
- (D) A list of whether the homogeneous areas identified under paragraph (a)(4)(vi)(B) of this section, are surfacing material, thermal system insulation, or miscellaneous material.
- (E) Assessments made of friable material, the name and signature of each accredited inspector making the assessment, State of accreditation, and if applicable, his or her accreditation number.”

EPA 40 CFR § 763.86 Sampling.

“(a) Surfacing material. An accredited inspector shall collect, in a statistically random manner that is representative of the homogeneous area, bulk samples from each homogeneous area of friable surfacing material that is not assumed to be ACM, and shall collect the samples as follows:

- (1) At least three bulk samples shall be collected from each homogeneous area that is 1,000 ft² or less, except as provided in § 763.87(c)(2).
- (2) At least five bulk samples shall be collected from each homogeneous area that is greater than 1, 000 ft² but less than or equal to 5000 ft² , except as provided in § 763.87(c)(2).
- (3) At least seven bulk samples shall be collected from each homogeneous area that is greater than 5,000 ft² , except as provided in § 763.87(c)(2).

(b) Thermal system insulation.

- (1) Except as provided in paragraphs (b)(2) through (4) of this section and §763.87(c), an accredited inspector shall collect, in a randomly distributed manner, at least three bulk samples from each homogeneous area of thermal system insulation that is not assumed to be ACM.
- (2) Collect at least one bulk sample from each homogeneous area of patched thermal system insulation that is not assumed to be ACM if the patched section is less than 6 linear or square feet.
- (3) In a manner sufficient to determine whether the material is ACM or not ACM, collect bulk samples from each insulated mechanical system that is not assumed to be ACM where cement or plaster is used on fittings such as tees, elbows, or valves, except as provided under §763.87(c)(2).

- (4) Bulk samples are not required to be collected from any homogeneous area where the accredited inspector has determined that the thermal system insulation is fiberglass, foam glass, rubber, or other non-ACBM.
- (c) Miscellaneous material. In a manner sufficient to determine whether material is ACM or not ACM, an accredited inspector shall collect bulk samples from each homogeneous area of friable miscellaneous material that is not assumed to be ACM.
- (d) Nonfriable suspected ACBM. If any homogeneous area of nonfriable suspected ACBM is not assumed to be ACM, then an accredited inspector shall collect, in a manner sufficient to determine whether the material is ACM or not ACM, bulk samples from the homogeneous area of nonfriable suspected ACBM that is not assumed to be ACM.

(Although not required, diagrams, drawings, and pictures are highly recommended to assist in illustrating the details of an inspection).